

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS

DERRICK WASHINGTON,

Plaintiff,

v.

MASSACHUSETTS DEPARTMENT OF
CORRECTION, *et al.*,

Defendants.

Case No. 1:23-cv-10063-MRG

MOTION TO ADMIT JAYDEN RUSH *PRO HAC VICE*

PLEASE TAKE NOTICE that, pursuant to Local Rule 83.5.3 of the Rules of this Court, Plaintiff moves for the admission of Jayden Rush, *pro hac vice*, on the following grounds:

1. Jayden Rush is admitted to practice and is in good standing before the State of New York. I have verified that Jayden Rush has active membership and good standing in the New York bar by checking the website operated by the state. He has no current disciplinary actions pending against him and has never been disciplined by any bar.

2. Jayden Rush has reviewed and is familiar with the Local Rules of this Court.

3. The undersigned, an attorney admitted to practice and in good standing before this Court, has appeared in this action.

4. Jayden Rush's office address is 55 Hudson Yards, Floor 20, New York, NY 10001

Dated: November 19, 2025

Respectfully submitted,

/s/ Benjamin P. Solomon-Schwartz

Benjamin P. Solomon-Schwartz (BBO # 688674)

BOIES SCHILLER FLEXNER LLP

1401 New York Avenue NW

Washington, District of Columbia 20005

bsolomon-schwartz@bsfllp.com

Tel: (202) 237-2727

Fax: (202) 237-6131

CERTIFICATE OF SERVICE

I hereby certify that on November 19, 2025, a true and correct copy of the foregoing has been served on all counsel of record via this Court's CM/ECF electronic filing system.

Dated: November 19, 2025

/s/ Benjamin Solomon-Schwartz
Benjamin P. Solomon-Schwartz